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Cantine Sociali Del Trentino Societa Cooperativa

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

CAVIT CANTINA VITICOLTORI
CONSORZIO CANTINE SOCIALI DEL
TRENTINO SOCIETA COOPERATIVA,

Plaintiff,

v.

BROWMAN FAMILY VINEYARDS INC.,

Defendant.

BROWMAN FAMILY VINEYARDS INC.

Plaintiff and Counterdefendant

v.

CAVIT CANTINA VITICOLTORI
CONSORZIO CANTINE SOCIALI DEL
TRENTINO SOCIETA COOPERATIVA,

Defendant and Counterclaimant.

Case No. C 3:09-01070 JSW (EMC)

Case No. C 09-02470 JSW (EMC)

(related cases)

**STIPULATION & [PROPOSED]
ORDER ADJUSTING BRIEFING
SCHEDULE ON CROSS-
MOTIONS TO COMPEL AND
FOR PROTECTIVE ORDER**

Date: November 24, 2009

Time: 10:30 a.m.

Place: Courtroom C, 15th Floor,
450 Golden Gate Avenue, San
Francisco, CA

BEFORE MAGISTRATE JUDGE
EDWARD M. CHEN

IT IS HEREBY STIPULATED by and between the parties, through their
counsel, as follows:

RECITALS

A. There is currently set for hearing on November 24, 2009, at 10:30 a.m., the
motion of Plaintiff and Counterdefendant BROWMAN FAMILY VINEYARDS INC.
[hereinafter "BROWMAN"] To Compel pertaining to certain discovery propounded by

1 BROWMAN upon Defendant and Counterclaimant CAVIT CANTINA VITICOLTORI
2 CONSORZIO CANTINE SOCIALI DEL TRENTINO SOCIETA COOPERATIVA
3 [hereinafter "CAVIT"]. Also set for hearing on the same date and time is a Motion For
4 Protective Order filed by CAVIT pertaining to the same discovery requests.

5 B. Pursuant to the Local Rules of this Court, opposition to the respective
6 motions is currently due on or before Tuesday, November 3, 2009. Reply filings are due on or
7 before November 10, 2009.

8 C. CAVIT is in the process of substituting new lead counsel. It is anticipated
9 that the application to substitute counsel and accompanying pro hac vice application will be
10 submitted shortly.

11 D. In order to provide new counsel with sufficient time to review the pending
12 motion papers, to prepare opposition to BROWMAN's Motion to Compel, and to otherwise
13 orient themselves into the matter,

14 IT IS THEREFORE STIPULATED as follows:

15 STIPULATION

16 1. The foregoing Recitals are incorporated by reference.

17 2. The parties respectfully request the Court to extend the time for filing
18 opposition to the respective motions to November 10, 2009, with reply submissions to be filed
19 on or before November 17, 2009, each representing an extension of one week from the current
20 dates. The parties acknowledge that this reduces the Court's time to review the parties'
21 respective submissions and thank the Court in advance for any accommodation that is
22 extended in that regard.

23 SO STIPULATED.

24 Dated: October 29, 2009.

LAW OFFICES OF ROBERT E. WHITE

25
26 By: /s/
27 Local Counsel for CAVIT CANTINA
28 VITICOLTORI CONSORZIO CANTINE
SOCIALI DEL TRENTINO SOCIETA
COOPERATIVA

1 SO STIPULATED.

2 Dated: October 29, 2009.

DICKENSON, PEATMAN & FOGARTY

3
4 By: /s/
J. SCOTT GERIEN
5 Attorneys for BROWMAN FAMILY
VINEYARDS INC.

6 ORDER APPROVING STIPULATION

7 The foregoing stipulation is approved and IT IS SO ORDERED. Opposition shall be filed
8 by 11/6/09. Reply shall be filed by 11/13/09.

9 Dated: October 29, 2009.
November 2, 2009

HONORABLE EDWARD C. CHEN
UNITED STATES MAGISTRATE JUDGE



